

Alan M. Rifkin
M. Celeste Bruce (MD, DC)
Patrick H. Roddy
Ty Kelly (MD, DC)
Alison C. Schurick
Edgar P. Silver (1923-2014)
†Of Counsel

Arnold M. Weiner
Charles S. Fax (MD, DC, NY)
Eric L. Bryant
Liesel J. Schopler (MD, DC)
Laurence Levitan†

Scott A. Livingston (MD, DC)
Jamie Eisenberg Katz (MD, DC, NY)
Michael D. Berman (MD, DC)
Brad I. Rifkin

Michael V. Johansen
Barry L. Gogel
Michael S. Nagy
Camille G. Fesche (MD, DC, NY, NJ)
Michael A. Miller†

Joel D. Rozner (MD, DC)
Aron U. Raskas (MD, DC)
Jonathan Biran (MD, DC)
Christopher J. Olsen (MD, DC)
Lance W. Billingsley†
John C. Reith (Nonlawyer/Consultant)

December 7, 2018

BY CM/ECF

The Honorable Theodore D. Chuang
United States District Judge
United States Courthouse
6500 Cherrywood Lane
Greenbelt, MD 20770

Re: United States v. Lissa Mel, Crim. No. TDC-18-0571

Dear Judge Chuang:

Per the Court's direction, I am writing to provide Defendant Lissa Mel's statement regarding Ms. Mel's conditions of release. Ms. Mel asks that her current conditions of release remain in place, with the following exceptions:

1. That Ms. Mel's conditions of release be temporarily modified to allow her to travel to Maryland for her arraignment next week. *See* Docket Nos. 31 and 32.
2. That Ms. Mel's location monitoring condition be modified to allow her to attend a Kundalini yoga and meditation class one day or evening per week at Nine Treasures Yoga, 8182 Sunset Boulevard, Suite 201, Los Angeles, California. According to the studio's website, the classes are 1.5 hours in length. For more information regarding this request in advance of Ms. Mel's arraignment, please refer to the Nine Treasures website, which can be found at www.ninetreasuresyoga.com.
3. That the Court consider removing Israel Tayeb as a co-signer on Ms. Mel's appearance bond. Ms. Mel and Mr. Tayeb's friendship unfortunately has deteriorated recently, and Mr. Tayeb has requested that he be released from his obligations under the appearance bond. I have spoken with Mr. Tayeb about this matter on two occasions, and both times he has told me that his desire to be removed as a co-signer is not based on any concern that Ms. Mel is a risk to flee the United States. Rather, he explained to me, Mr. Tayeb simply does not want to be involved in any aspect of Ms. Mel's life going

forward. Ms. Mel has attempted without success to locate another United States citizen or green card holder who is willing to substitute for Mr. Tayeb on the appearance bond. The much more significant security in this matter – David Balmas’ agreement to forfeit \$250,000, secured by an agreement to forfeit equity in a parcel of real property having that value – remains in place. Mr. Balmas is also the third party custodian for Ms. Mel. Ms. Mel is willing to execute a new appearance bond without Mr. Tayeb as a co-signer. Ms. Mel would object to any additional restrictions being added to her conditions of release if Mr. Tayeb were to be removed as a co-signer.

Very truly yours,

/s/

Jonathan Biran

cc: Tracee Plowell, Esq.
Ankush Khardori, Esq.
Ileen Rodrigues, Pretrial Services
James Ridgway, Pretrial Services